

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS DAVESTIANA WILSON (b) County of Residence of First Listed Plaintiff <u>Bucks</u> (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorneys (Firm Name, Address, and Telephone Number) Adam S. Barrist, Esq., 215-432-8829 P.O. Box 1820, Media, PA 19063		DEFENDANTS THE UNITED STATES OF AMERICA County of Residence of First Listed Defendant _____ (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known) _____																									
II. BASIS OF JURISDICTION (Place an "X" in One Box Only)		III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)																									
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IV. NATURE OF SUIT (Place an "X" in One Box Only)		Click here for: Nature of Suit Code Descriptions.																									
CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	TORTS <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="vertical-align: top;"> PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - 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Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	OTHER STATUTES <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes																					
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V. ORIGIN (Place an "X" in One Box Only)																											
<input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from Another District (specify) _____ <input type="checkbox"/> 6 Multidistrict Litigation - Transfer <input type="checkbox"/> 8 Multidistrict Litigation - Direct File																											
VI. CAUSE OF ACTION		Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): <u>28 U.S.C §2671, et seq</u> Brief description of cause: <u>Federal Tort Claims Act motor vehicle collision involving United States Postal Service vehicle</u>																									
VII. REQUESTED IN COMPLAINT:		<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ <u>In excess of \$150,000.00</u> CHECK YES only if demanded in complaint: JURY DEMAND: <input type="checkbox"/> Yes <input type="checkbox"/> No																									
VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____																											
DATE 01/14/2022		SIGNATURE OF ATTORNEY OF RECORD /s/ ASB3587																									
FOR OFFICE USE ONLY																											
RECEIPT # _____	AMOUNT _____	APPLYING IFP _____	JUDGE _____																								
MAG. JUDGE _____																											

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**


CASE MANAGEMENT TRACK DESIGNATION FORM

DAVESTIANA WILSON	:	CIVIL ACTION
Plaintiff	:	
v.	:	
THE UNITED STATES OF AMERICA	:	
Defendant	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

<u>01/14/2022</u> Date	 Attorney-at-law	<u>DAVESTIANA WILSON</u> Attorney for
<u>215-432-8829</u> Telephone	<u>267-247-3098</u> FAX Number	<u>abarrist@barristfirm.com</u> E-Mail Address

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 1405 Veterans Highway, Apt. E-8, Bristol, PA 19007

Address of Defendant: 615 Market Street, Suite 1250, Philadelphia, PA 19106

Place of Accident, Incident or Transaction: Fairless Hills, PA

RELATED CASE, IF ANY:

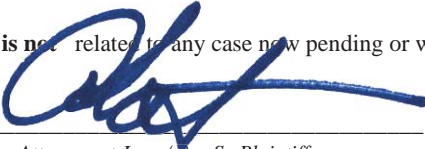
Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 01/14/2022


Attorney-at-Law / Pro Se Plaintiff

88645
Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- | | |
|-------------------------------------|-----------------------------------------------------------------|
| <input type="checkbox"/> | 1. Indemnity Contract, Marine Contract, and All Other Contracts |
| <input type="checkbox"/> | 2. FELA |
| <input type="checkbox"/> | 3. Jones Act-Personal Injury |
| <input type="checkbox"/> | 4. Antitrust |
| <input type="checkbox"/> | 5. Patent |
| <input type="checkbox"/> | 6. Labor-Management Relations |
| <input type="checkbox"/> | 7. Civil Rights |
| <input type="checkbox"/> | 8. Habeas Corpus |
| <input type="checkbox"/> | 9. Securities Act(s) Cases |
| <input type="checkbox"/> | 10. Social Security Review Cases |
| <input checked="" type="checkbox"/> | 11. All other Federal Question Cases |
- (Please specify): Federal Tort Claims Act

B. Diversity Jurisdiction Cases:

- | | |
|--------------------------|--------------------------------------------------|
| <input type="checkbox"/> | 1. Insurance Contract and Other Contracts |
| <input type="checkbox"/> | 2. Airplane Personal Injury |
| <input type="checkbox"/> | 3. Assault, Defamation |
| <input type="checkbox"/> | 4. Marine Personal Injury |
| <input type="checkbox"/> | 5. Motor Vehicle Personal Injury |
| <input type="checkbox"/> | 6. Other Personal Injury (Please specify): _____ |
| <input type="checkbox"/> | 7. Products Liability |
| <input type="checkbox"/> | 8. Products Liability – Asbestos |
| <input type="checkbox"/> | 9. All other Diversity Cases |
- (Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Adam S. Barrist, Esq., counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 01/14/2022


Attorney-at-Law / Pro Se Plaintiff

88645
Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

CIVIL ACTION
No. _____

1. Plaintiff is an adult individual, citizen, resident and domiciliary of the Commonwealth of Pennsylvania, with a home address of 1405 Veterans Highway, Apt. E-8, Bristol, PA 19007.
2. Defendant, The United States of America is the proper Defendant in this Federal Tort Claims Act Complaint, which, as set forth below, pertains to acts of tortious negligence committed by the United States Postal Service.
3. The United States of America is subject to service of process, pursuant to Fed. Rule Civ.P. 4(i)(1), via both the United States Attorney for the Eastern District of Pennsylvania, 601

Market Street, Suite 1250, Philadelphia, PA 19106 and the Attorney General of the United States at U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530.

JURISDICTION AND VENUE

4. Jurisdiction is conferred on this Federal Tort Claim, pursuant to 28 U.S.C. §2671, *et seq.*
5. Plaintiff timely filed a Standard Form 95 claim with Defendant.
6. Pursuant to 28 U.S.C. §2675, six months have elapsed since Plaintiff filed her Standard Form 95 claim.
7. Via a letter dated January 6, 2022, The United States Postal Service denied Plaintiff's claim.
8. Accordingly, this suit is ripe.
9. Venue is proper in this Court since the injuries complained of occurred in Fairless Hills, Bucks County, PA, within this Federal District.

FACTS

10. On March 24, 2021, Ms. Wilson was severely injured when Christopher Boyle ("Mr. Boyle") negligently struck Ms. Wilson's vehicle while she was traveling straight on New Falls Road at the intersection with Oxford Valley Road in Fairless Hills, PA.
11. At the time of the collision, Mr. Boyle was operating in the course and scope of his employment for the United States Postal Service and was driving a United States Postal Service vehicle.
12. Such violent collision caused Ms. Wilson to a) sustain the permanent injuries described below, that have caused her body to not heal or function normally with further medical

treatment; and **b)** suffer significant financial harm.

COUNT ONE – NEGLIGENCE

13. Plaintiff incorporates, by reference, the foregoing paragraphs, as though set forth fully herein.
14. As the direct and proximate cause of Defendant's negligence as stated above, Ms. Wilson has suffered severe permanent physical injury and financial loss.
15. The injuries that Ms. Wilson has sustained are permanent in nature. Ms. Wilson has suffered great physical and mental pain and anguish, and in all reasonable probability, will continue to suffer in this manner for a long time in the future, if not for the balance of her natural life.
16. As a further result of the above negligent acts committed by Defendant, Ms. Wilson has incurred and will continue to incur substantial medical expenses for medical care and attention and will continue to incur additional medical expenses into the foreseeable future.
17. As a further result of the above negligent acts committed by Defendant, Ms. Wilson has incurred and will continue to incur substantial financial harm due to vehicular property damage.
18. In addition, Ms. Wilson has suffered other economic injury and will likely continue to suffer such economic injury.
19. Defendant, vicariously, through its agent/employee/authorized representative, Mr. Boyle, operated its vehicle in such a careless and/or negligent manner as to have caused the aforesaid collision to occur.
20. Defendant had a duty to Ms. Wilson to not employ individuals who would operate its

vehicle in such a careless and/or negligent manner.

21. Defendant breached said duty, as set forth below.

22. As a direct and proximate result of the aforesaid acts, omissions, carelessness and/or negligence on the part of Defendant, Ms. Wilson suffered severe personal injuries; has been and will be in the future, made to endure great pain and suffering, both physical and mental in nature, has been and will be in the future required to expend great sums of money for medical services; has been and will be in the future prevented from attending to her regular activities, duties and responsibilities; has been and will in the future be made to suffer lost earnings and other pecuniary loss.

23. The aforesaid accident was caused by the negligence and/or carelessness of Defendant because it, itself, and/or, vicariously, through its agent/employee/authorized representative, Mr. Boyle:

- a) Failed to keep its vehicle under control at all relevant times;
- b) Caused its vehicle to be driven at an excessive speed under the circumstances;
- c) Violated the Assured Clear Distance Ahead Rule;
- d) Disregarded traffic signals and signs;
- e) Failed to keep a proper lookout;
- f) Violently struck Plaintiff's vehicle;
- g) Was driving in distracted fashion;
- h) Negligently hired Mr. Boyle;
- i) Negligently trained Mr. Boyle;
- j) Negligently caused/forced Mr. Boyle to drive its vehicle when he was in an unfit physical and/or mental condition to do so;
- k) Caused its vehicle to be in an unsafe condition; and

- l) Otherwise failed to exercise due care under the circumstances.
24. As the result of the above-referenced accident, Ms. Wilson suffered painful and serious injuries, including, but not limited to:
- a) C6 radiculopathy;
 - b) other radiculopathy;
 - c) cervicalgia;
 - d) nerve damage throughout her body;
 - e) strains, sprains, disc bulges and disc herniations throughout her body, the extent of which is presently unknown;
 - f) torn ligaments and tendons throughout her body, the extent of which is presently unknown;
 - g) head injuries, the extent of which is presently unknown; and
 - h) emotional harm, the extent of which is presently unknown.
25. As a result of such accident, Ms. Wilson has incurred medical expenses and will continue to incur said medical expenses for an indefinite time into the future.
26. As a result of such accident, Ms. Wilson has incurred unreimbursed property loss/damages and will continue to incur said expenses for an indefinite time into the future.
27. As a result of such accident, Ms. Wilson suffered grievous pain and suffering and may continue to suffer same for an indefinite time into the future.
28. As a result of such accident, Ms. Wilson has suffered lost wages, and will suffer a loss of future earnings capacity.
29. As a further result of such accident, Ms. Wilson has suffered and will continue to suffer a loss of life's pleasures.

WHEREFORE, Plaintiff, Davestiana Wilson, demands judgment against the Defendant, the United States of America, in an amount in excess of \$150,000.00, plus costs, fees and whatever additional relief that this Honorable Court deems just and appropriate.

THE BARRIST FIRM, LLC

A handwritten signature in blue ink, appearing to read 'Adam S. Barrist', with a long horizontal flourish extending to the right.

By: /s/ ASB3587

Adam S. Barrist, Esq.
THE BARRIST FIRM, LLC
P.O. Box 1820
Media, PA 19063

Attorney for Plaintiff

Date: January 14, 2022